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**510(k) Summary**

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**NAME OF FIRM:** OrthoPediatrics, Corp.  
2850 Frontier Drive  
Warsaw, IN 46582

**DATE PREPARED:** March 7, 2013

**510(K) CONTACT:** Mark Fox  
Vice President, Regulatory Affairs  
Tel: (574) 268-6379

**PROPOSED TRADE NAME:** Response Spine System

**DEVICE CLASSIFICATION:** Class II; 21 CFR 888.3070 and 21 CFR 888.3050

**CLASSIFICATION NAME:** Pedicle screw spinal system , adolescent idiopathic scoliosis orthosis; spinal interlaminar fixation orthosis

**PRODUCT CODE:** OSH; KWP

**DEVICE DESCRIPTION:** The Response Spine System consists of longitudinal members (rods), anchors (hooks and screws), interconnection components (rod-to-rod and anchor-to-rod connectors) and fasteners in a variety of sizes, including fixed angled screws, to accommodate differing anatomic requirements.

**INDICATIONS FOR USE:** The Response Spine System is intended for posterior, non-cervical fixation (pedicle screw fixation T1-S2/ilium and hook fixation (T1-L5)) in pediatric patients is indicated as an adjunct to fusion to treat adolescent idiopathic scoliosis. The device is intended to be used with autograft and/or allograft.

**MATERIALS:** Medical grade titanium alloy – ASTM F136-08e1  
Medical grade cobalt-chromium-molybdenum – ASTM F1537-08

**PREDICATE DEVICES:** OrthoPediatrics' OP Spine System (K120291 and K121250)  
Medtronic CD Horizon (K091445)

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**TECHNOLOGIC  
CHARACTERISTICS:**

The fundamental scientific principles and technological characteristics, including the material, and general design, and sizes of the device are substantially the same as the predicate devices. Fixed angle (non-swivel) screws have been added to the system while the smaller diameter longitudinal rod has been eliminated from the system.

**PERFORMANCE  
DATA:**

Static and dynamic compression bending tests and static torsion tests, performed according to ASTM F1717, demonstrated the device to be substantially equivalent to the predicate devices.

**CONCLUSION:**

The Response Spine System has the same intended use and technological characteristics as the predicate devices. Therefore the Response Spine System is substantially equivalent for its intended use.



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration  
10903 New Hampshire Avenue  
Document Control Center – WO66-G609  
Silver Spring, MD 20993-0002

May 8, 2013

OrthoPediatrics, Corporation  
% Mr. Mark Fox  
Vice President, Regulatory Affairs  
2850 Frontier Drive  
Warsaw, Indiana 46582

Re: K130655

Trade/Device Name: Response Spine System  
Regulation Number: 21 CFR 888.3070  
Regulation Name: Pedicle screw spinal system  
Regulatory Class: Class II  
Product Code: OSH, KWP  
Dated: March 20, 2013  
Received: March 21, 2013

Dear Mr. Fox:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA).

You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set

forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050. If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address <http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to <http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm> for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address <http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm>.

Sincerely yours,

**Erin H. Keith**

Mark N. Melkerson  
Director  
Division of Orthopedic Devices  
Office of Device Evaluation  
Center for Devices and  
Radiological Health

Enclosure

